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Attorneys for Movant, the ATD Group

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE,  
ROBERT E. RUBIN, STEPHEN R. VOLK, SALLIE  
L. KRAWCHECK, GARY L. CRITTENDEN and  
ROBERT DRUSKIN,

Defendants.

Civil Action No.  
07 CIV 9901 (SHS)

LENNARD HAMMERSCHLAG, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, SALLIE  
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

No. 07 CIV 10258 (SHS)

**REPLY AFFIDAVIT OF PETER S. LINDEN IN FURTHER SUPPORT OF THE  
ATD GROUP'S MOTION FOR APPOINTMENT AS LEAD PLAINTIFF**

PETER S. LINDEN being duly sworn, says:

1. I am a member of the law firm of Kirby McInerney LLP, counsel for The ATD Group. As such I have knowledge of the matters set forth below.

2. Annexed hereto as exhibits are true and correct copies of the following documents:

a. January 31, 2008 Reply Declaration of ATD Group Member David Whitcomb.

b. January 31, 2008 Declaration of ATD Group Member Henrietta Whitcomb.

c. January 30, 2008 Declaration of ATD Group Members David Diamond and Jonathan Butler.

d. January 31, 2008 Declaration of Edward and Elaine Altman.

e. Chart obtained from the Yahoo Finance Web Database showing the opening, closing, high and low trading prices for Citigroup common stock during the month June, 2007.

f. Excerpts from the Complaint filed by the Global Pension Fund Movants on January 7, 2008 in the action of *Public Employees Retirement Association of Colorado, et al. v. Citigroup, Inc., et al.*, 08-CV-135 (S.D.N.Y.).

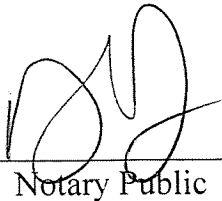
g. Copy of a letter that I wrote on January 11, 2008 to Michael Pucillo, co-counsel for the U.S. Pension Fund Group in response to a letter that he wrote to me on January 9, 2008, a copy of which is also attached.

h. Page taken from the Stanford Law School Securities Class Action Clearing House Website which is produced in connection with Cornerstone Research. The page lists, *inter alia*, the total number of federal securities fraud class actions commenced year-by-year since the PSLRA took effect. It is my understanding that when multiple class actions are commenced on behalf of identical or largely overlapping investor classes (as was the case in this litigation), those actions are listed as a single action for the purposes of this web database.



PETER S. LINDEN

Sworn to before me this  
7th day of February, 2008.

  
Notary Public

Daniel Hume  
Notary Public, State of New York  
No. 31-5056750  
Qualified in New York County  
Commission Expires 3/2/09